Performance Based vs. Competitive Program

Definition –

Performance Based means a grant program that is focused on the content and quality of a grant application. DWR would work with applicants on a scope of work to develop or improve an IRWM plan. When the scope meets a pre-established standard an applicant could pursue a planning grant. Similarly, when an applicant's IRWM plan meets pre-established requirements, the applicant could pursue implementation funding. The program would not be deadline driven.

Competitive means a grant program similar to what has been run in previous rounds, where all applications are due on a specific date; application contents are evaluated against an established set of scoring criteria; applications are ranked; and funding decisions are based on application ranking and available funding.

Observations from Previous Efforts –

- Applicants generally could have benefited from more state involvement in the development of IRWM Plans.
- Applicants could have benefited from a more interactive/iterative grant program versus submitting everything in an application package and being critiqued only on the single submission.
- Not all applicants are at the same stage in plan development making it difficult for some to compete.
- Deadlines, rather than long-term goals have driven past planning efforts

DWR Concept for IRWM Grant Program –

DWR is considering modifying the program to be more performance based. DWR would have more contact with applicants to monitor and assist performance, and deadlines would not drive the process.

Input Questions –

From your regions perspective, what are the advantages/disadvantages of a Competitive Grant Program?

Advantages:

- o All applicants are evaluated based on uniform evaluation criteria and set deadlines.
- A competitive process motivates regions to work together to develop and present the best possible applications.
- Deadlines associated with a competitive grant program promote action and a sense of urgency.

Disadvantages:

- The competitive process is very costly and time consuming and regions with limited resources may be forced out of the process.
- There are limited interaction and feedback opportunities with DWR staff.
- The competitive process may focus too much on short term goals. Long term goals need to be taken into account.
- Working to an artificially imposed deadline may present time constraints that prevent developing the best possible application.

Continued on back

Performance Based or Competitive Program Input

From your regions perspective, what are the advantages/disadvantages of a Performance Based Grant Program?

Advantages

- It will allow agencies to work more closely with DWR, which will improve the quality of planning, grant application packages and projects.
- The iterative process will increase the chances of success for applicants with fewer resources.

Disadvantages

- Less competition may reduce motivation for producing the highest quality of applications.
- If funds are available on a first come, first serve basis, regions that take longer to develop and submit applications may miss out on funding.
- It may be difficult to gauge performance for applicants that were not fully engaged during the first round or do not have existing plans/projects in place on which to judge merit.

Which type of program would your region prefer and why?

- A hybrid approach combining elements of both programs is best. An element of competition should be retained as it ensures that regions that put efforts and resources into the regional planning process are rewarded.
- A most important feature to include would be the promise of a certain amount of funds available for a region. In the other words, the funds should **not** be allocated on a first come basis. This allows regions to develop the best plans based on their stage of IRWMP development and available resources.
- Deadlines and milestones on both the applicant and DWR side should be employed to maintain urgency and keep the process moving forward.
- It is also important to have constructive dialogue and input from DWR in a timely manner on meeting standards. It would not be productive to prepare an application, submit it for review, and get feedback months later that it doesn't qualify.
- DWR needs to clearly define how the funding from different sources will be allocated and on what scale.
 - We agree with the concept of funding some planning grants and DACs with the \$100 million of Prop 84 IRWM program funds that are designated as "interregional/unallocated". But we suggest DWR clearly indicate how much funding will be available for planning grants and how much will be available for DACs.
 - The current suggestion by DWR to have a consolidated application for 3 funding sources (Props 50, 84 and 1E) seems to set up potential confusion if there are separate additional requirements, limitations and criteria attached to projects applying for and potentially receiving funds from two or more of these sources.
- o Include provisions that will provide DACs a realistic chance at obtaining funding that is based on the critical needs of the communities and not limited by the status of the associated regional

effort.

Are there other ideas or suggestions you have concerning performance based versus a competitive grant program?

The following suggestions apply regardless of the ultimate form of the grant program:

- Clear and attainable performance based performance goals and plan standards need to be set in advance so that applicants are not trying to meet a moving target.
- Although it is appropriate to include meeting statewide priorities as a consideration, the program should recognize regional differences and reward applicants that are truly addressing regional needs (such as the Greater Los Angeles Region, which has adopted quantifiable regional objectives and associated planning targets).
- Time will be of the essence in preparing IRWMPs that meet minimum standards, so for an effective iterative process, we recommend that DWR return comments within 30 days (or other appropriate turnaround period) of receiving application submissions.
- DWR should take steps to ensure that there is consistency in applying evaluation standards and criteria among DWR reviewers throughout the state.

IRWM Plan Standards

Observations from Previous Efforts –

Minimum standards for IRWM plans included in the guidelines may not be sufficient to ensure high quality. Governance of an IRWM plan was not always easily addressed.

Project development and selection was not always tied to measurable plan objectives.

Stakeholder involvement was inadequate in some plans.

Other Observations -

Proposition 84 contains language that will necessitate changes in the guidelines and standards. Eleven funding areas will limit competition as a means to ensure quality if plans.

DWR Concept for IRWM Grant Program –

- DWR is considering emphasis on planning prior to funding implementation projects.
- DWR is considering holding IRWM Plans to pre-established standards.
- Standards would be added or modified (such as project prioritization and governance) in the guidelines.
- Applicants would not be eligible to pursue implementation grants until the IRWM Plan meets a preestablished standards.
- Planning grants would be predicated on a scope of work that produces an IRWM plan that will meet the pre-established standards.

Input Questions –

Based on your experience with the current standards which ones were difficult to address? Please discuss what made them difficult.

- The Integration plan standard was the most difficult to address because it was not well defined. The limited timeframe available presented the most challenges in developing truly integrated projects.
- Standards should also be broad enough to allow each region to cooperatively address the standards and to develop objectives that recognize regional uniqueness.

Continued on back

IRWM Plan Input

Which standards,	if any, we	re not helpful	in your	IRWM Plan?
------------------	------------	----------------	---------	------------

What elements would be helpful for DWR to include or explain in a governance standard?

- Well defined desired outcomes that allow regions to work out the governance structure to achieve these desired outcomes.
- Well articulated policy elements that allow IRWM planning regions to demonstrate how they intend to address these policy elements through regional decision making and governance structure.
 Examples of these policy elements may include:
 - Selecting and prioritizing projects
 - Establishing goals and objectives
 - Distributing funds and monitoring performance.
- It is important that DWR resolve its standard for governance before establishing guidelines for Prop 84 and 1E. Within regions that are currently addressing or refining their governance structures, greater certainty about DWR governance expectations would promote greater regional participation and buy-in.

What elements would NOT be helpful for DWR to include in a governance standard (what would make a governance standard too restrictive)?

- Detailed prescriptive standards that dictate who needs to be involved would not be helpful to promoting a regionally self-determined process.
- The size of the governing body should not be limited, nor should DWR place any limitations on or make requirements for members of the governing body.

In what areas was it important for your plan to exceed the minimum standards?

 The Greater Los Angeles Region sought to exceed the minimum standards on objective setting by establishing quantifiable regional objectives which helped to clarify what targets the region was seeking to achieve and will be useful in evaluating projects and measuring progress.

Disadvantaged Communities

Comment Summary from Previous Efforts –

Incentives to reduce cost share for DAC did not address hardships DACs face engaging the IRWM process.

DWR Concept for IRWM Grant Program -

Through Prop 84 DWR does have the means to provide some technical assistance and financial assistance to help DAC engage in their regional IRWM processes. DWR is considering implementing this assistance early in the process so DAC's can engage more fully in IRWM planning and/or application preparation processes. DWR is also considering allocating funding to projects that meet critical needs of DACs.

Input Questions –

What types of technical assistance would be helpful to augment your region's efforts to engage DACs in the IRWM process?

- Technical assistance is greatly needed by the DACs in the Greater Los Angeles Region.
- Two types of technical assistance to disadvantage communities are needed and have proven successful in the Greater Los Angeles Region:
 - Indirect assistance: Entities provide guidance and assistance to DACs in either grant writing or technical issues. Disadvantaged communities need technical assistance to develop and implement projects in their neighborhoods.
 - o Direct assistance: Entities lead planning and or implementation efforts within DACs with the involvement and support of the community.

Are there specific functions that DWR personnel can provide in the IRWM process that would help engage DACs?

- DWR can take a number steps to help promote engage DACs in the IRWM process. These include:
 - Expanding communication to DACs and those who can support them about the availability of funds to develop and implement projects specifically targeted to benefit DACs. However, communication needs to be more direct than just one or two workshops encompassing all of Southern California as city staff from <u>DACs</u> within smaller cities is frequently unable to attend due to staffing/budget constraints.
 - Providing leadership on the outreach to DACs by structuring funding support in a way that directly supports DACs. This can be best achieved by directing efforts through existing entities that are best positioned to assist DACs.
 - o For DACs that do request assistance, offering to provide review and input to their grant application, planning and implementation efforts.
 - o Clarifying the goals that DWR is trying to achieve with its DAC outreach.
- Local entities within the Greater Los Angeles Region are well positioned to provide support to DACs and engage them in the IRWM process. DWR's process should support these efforts.

In addition to technical assistance, is there also need for financial assistance and how do you envision those funds being used?

- In the Los Angeles region, there a dozens of DACs populated by over 1 million people. Financial
 assistance is greatly needed to help develop and implement water supply, water quality and
 environmental enhancement projects within these communities.
- Within the IRWM program, planning and project implementation funds should be earmarked in proportion to the size of DACs and/or income level and need and targeted to directly support them. Funds should be offered via a separate pool and should remain in place as it may take additional time for projects in DACs to reach the implementation stage.
- o Funds should be directed to public and private entities that are best positioned to assist DACs in developing their projects.

Continued on back.

Disadvantaged Community Support Input

Is addressing water quality and supply issues that directly impact DACs a priority in your region?

- Addressing water quality and supply issues in DACs is a very significant priority in the Greater Los Angeles Region. In the region, over 1 million people reside in what would be classified as disadvantaged communities by the IRWM program standard (80% of statewide median household income). These DACs are found throughout the area, some encompassing entire cities, others encompassing portions of cities. In general, all our found within a heavily urban setting and are facing three critical challenges relevant to the IRWM program:
 - Water quality challenges: DACs are charged with meeting costly new stormwater regulations and upgrading infrastructure without effective ways to secure the funding needed.
 - Water supply challenges: Suppliers are striving to keep water supplies affordable water supplies for residents. In addition, suppliers are striving to promote water conservation in the generally high density DACs.
 - Environmental, habitat and recreational challenges: DACs are struggling to preserve what little environmental features exist and/or establish (or re-establish) the environment which once existed. In addition, DACs are struggling to provide sufficient open space and recreational opportunities for their residents.

Can the IRWM Process address direct water supply and quality problems in DACs? If so how? How was this addressed in your IRWM Plan

- The water supply, water quality, and environmental issues addressed in the IRWMP for the Los Angeles region are common throughout the region and are found both in DACs and non-DACs.
- The IRWM process can directly address water supply and quality problems in DACs. Ways that this has been approached in the Los Angeles region include:
 - o Incorporate DACs into IRWMP goals and objectives
 - Identify and draw attention to water supply and water needs in DACs through sub-regional steering committees
 - Identify entities who are well-positioned to provide support to these DACs to address water supply and water quality problems.

Are there other ideas or suggestions you have concerning engaging disadvantaged communities in the IRWM process? Are there items that DWR should emulate, retain or drop from other grant programs regarding DACs?

 Defining DACs: In the Los Angeles region, we have found it beneficial to consider DACs on a community or census-tract basis and not solely on a city-wide or county-wide basis. If DWR were to define and make available funds to DACs on more than one basis, more communities could potentially qualify for DAC support.

Regional Definition

Comment Summary from Previous Efforts –

Provide a better definition of what a region is. Provide direction on appropriate regions.

DWR Concept for IRWM Grant Program -

Work with regional efforts upfront to establish functional regional/sub-regional efforts. The timing of Funding for implementation efforts will reflect the readiness of the various funding areas. DWR will work with regions to "pre-screen" regional efforts for readiness.

Input Questions –

Based on you experience with the existing IRWM Grant Program, how can the definition of a "region" be improved?

- Regions should be larger than just city boundaries and follow watershed boundaries.
- There should be provisions for taking into account the size, complexity and needs of the region in determining the funds that are awarded.
- The relationship between a defined region and all available funding sources from DWR and SWRCB should be clearly stated. Some current questions are:
 - Once an IRWMP has been adopted, who can apply for funds via the consolidated application?
 - Which Prop. 84 funds are limited to just IRWM regions?
 - Will Prop. 1E funds be awarded through the IRWMP process? Who can apply? Is there a separate prioritization process necessary?

What factors other than water management objectives and hydrologic, watershed, and political boundaries should be considered in establishing IRWM Plan Region Boundaries?

The factors listed in the question **are** the most important considerations.

For Prop 84 funding areas with multiple IRWM Planning Regions, identify possible mechanism for equitable distribution of limited funding.

This is an area of active, ongoing discussions between the Greater Los Angeles Region and neighboring regions.

takeholder Involvement or your region, please describe briefly who are the stakeholders and rate the	oir loval of i	avolvomont	
STAKEHOLDER INTERESTS	HIGH	MED	LOW
Water Districts	X	WIED	LOW
Sanitary Districts	X		
Flood Control Districts	X		
City Government (LARGE CITIES ONLY)	X	_	
County Government	X	AGA	
Municipalities (MEDIUM AND SMALL CITIES; SPECIAL DISTRICTS)		X	
Associations of Government Agencies		X	
Tribes			X
Watershed Groups		X	
Environmental Groups		X	
Community Based Groups		X	
Environmental Justice Organizations		X	
Representatives Disadvantaged Communities			X
Private Landowners			X
General Public		X	
Universities			X
Industry/Trade Organizations			X
Other – List			

Please discuss if there are other stakeholders who should be involved in your regional efforts, but have not been.

Additional efforts could be made to involve stakeholders who were identified with low levels of involvement above.

Please discuss efforts that your region has made to ensure that IRWM Planning efforts are inclusive of diverse stakeholder interests.

- Representatives from a number of organizations representing diverse stakeholder interests were included in the IRWMP contact database and were sent notifications of upcoming meetings and opportunities to participate. A public website was maintained to provide up-todate information and to allow project submission.
- Challenges to gaining active involvement include available funding for smaller city staff, time constraints of stakeholder representatives exacerbated by long travel distances and traffic congestion

OPTIONAL	_ – Please provide brief information about the person(s) completing this form			
Region:	Greater Los Angeles Region			
Name	Hector Bordas			
Address	900 South Fremont Ave.			
	Alhambra, CA 91803			
If you are not already on the DWR IRWM Mailing/Distribution List. Please add the above listed person(s) to				
the IRWM o	distribution list.			